Engineer Name	Jagmeet Kahlon
Engineer's Regional Manager	Rupi Gill
Facility Name	General Mills Operations, Inc.
Facility #	N-355
Project #	N-1121419
More than one ATC?	yes
ATC's	Authorities to Construct N-355-14-4 and '-78-5
(ex. Authorities to Construct S-	2
134-3-2, '-4-3, and '6-2)	
Modification Details	The project included modifications to the existing bulk
(Complete Sentences)	material mixing operations.
Contact Receiving Proposed	Mr. Wade Broughton
Mailing Address	2000 W Turner Road
	Lodi, CA 95242-2239





JUL 0 9 2012

Gerardo C. Rios, Chief Permits Office Air Division U.S. EPA - Region IX 75 Hawthorne St San Francisco, CA 94105

Re:

**Notice of Minor Title V Permit Modification** 

District Facility # N-355 **Project # N-1121419** 

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. General Mills Operations, Inc. is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct N-355-14-4 and '-78-5 into the Title V operating permit. The project included modifications to the existing bulk material mixing operations.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-355-14-4 and '-78-5, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Director of Permit Services

Enclosures

Seyed Sadredin

Executive Director/Air Pollution Control Officer





JUL 0 9 2012

Wade Broughton General Mills Operations, Inc. 2000 W Turner Road Lodi, CA 95242-2239

Re:

**Notice of Minor Title V Permit Modification** 

**District Facility # N-355 Project # N-1121419** 

Dear Mr. Broughton:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct N-355-14-4 and '-78-5 into the Title V operating permit. The project included modifications to the existing bulk material mixing operations.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct N-355-14-4 and '-78-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

David Warner

Director of Permit Services

**Enclosures** 

Seved Sadredin

www.valleyair.org

**Executive Director/Air Pollution Control Officer** 

# Title V APPLICATION REVIEW Minor Modification

**Facility Number:** 

N-355

**Date:** July 3, 2012

Facility Name:

General Mills Operations, Inc.

Mailing Address:

2000 W Turner Road Lodi. CA 95242-2239

**Contact Name:** 

Wade Broughton

Phone:

(209) 334-7090

Fax:

(209) 334-7090

Responsible Official:

**Jason Schierling** 

Title:

Plant Manager

Processing Staff:

Jag Kahlon

**Project Number:** 

N-1121419

## I. PROPOSAL

General Mills Operations, Inc. has proposed to incorporate Authority to Construct (ATC) permits N-355-14-4 and '-78-5 into their Title V operating permit. These ATC permits were issued without Certificate of Conformity (COC). The proposed modifications under these permits were as follows:

### N-355-14-4:

- Replace the existing HAF Equipment Model 58BV25S2 dust collector (HC-76) serving the ribbon mixer #28 with a HAF Equipment Model 24HLBV10S2 dust collector (HC-76);
- > Install a new scale hopper for receiving flour and sweetener and vent it to a HAF Equipment Model 24HLBV10S2 dust collector system (HC-91); and
- Install a new separate HAF Equipment Model 24HLBV10S2 dust collector system (HC-90) that will serve the existing scale hopper for flour material. This hopper is currently vented to the dust collector (HC-76) serving the ribbon mixer #28.

The proposed modifications will allow General Mills to efficiently operate the material batching and mixing processes and precisely meter the amount of materials needed for a particular recipe batch utilizing ribbon mixer #28.

#### N-355-78-5:

Install a new bag dump hopper for dry micro-ingredients and spices and vent it to a HAF Equipment Model 3636S dust collector (HC-89). Currently, bags full of dry ingredients and spices are manually dumped in a ribbon mixer #23 which is vented to a dust collector (HC-21); and

- ➤ Install a new separate HAF Equipment Model 24HLBV10S2 dust collector system (HC-88) that will serve the existing scale hopper for flour material. This hopper is currently vented to the dust collector (HC-21) serving mixer #23.
- Consolidate permit N-355-23 into N-355-78. Examination of the confidential process flow diagram and discussions with the applicant revealed that the ribbon mixer #23 (H-21), which is permitted under N-355-23, is actually one of the ribbon mixers referred to on permit N-355-78. Since a piece of equipment cannot have multiple permits, the equipment permitted under N-355-23 will be consolidated into N-355-78. The Authority to Construct (ATC) permit N-355-78-5 will contain a condition requiring cancellation of N-355-23 upon implementation.

The proposed modifications will allow General Mills to efficiently operate the material batching and mixing processes and precisely meter the amount of materials needed for a particular recipe batch utilizing ribbon mixers #23 (H-21) and holding mixer (a.k.a. ribbon mixer) H-23.

The purpose of this document is to identify all applicable requirements, determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for revising permit conditions that were established under Permits to Operate (PTO) N-355-14-3 and '-78-4.

## II. FACILITY LOCATION

This facility is located at 2000 West Turner Road in Lodi,, California.

## III. EQUIPMENT DESCRIPTION

#### N-355-14-4:

BULK MATERIAL MIXING OPERATION: TWO FLOUR/SWEETENER SCALE HOPPERS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-90, HC-91), A MIXER #28 AND MANUALLY ADDED INGREDIENTS OPERATION VENTED TO A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-76), A DAY BIN, TWO TRANSITION PNEUMATIC CONVEYING SYSTEMS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 18BV4S2 DUST COLLECTOR (HC-92, HC-93), AND TWO DAY BINS

#### N-355-78-5:

BULK MATERIAL MIXING OPERATION: ONE MAJORS BAG DUMP HOPPER (H-19) SERVED BY AN ANDERSON DAHLEN/FLEX-KLEEN MODEL 18CTBS24I FILTER RECEIVER (HC-19), ONE FLEX-KLEEN MODEL 18CTBS24I MINORS FILTER RECEIVER (HC-20), ONE FLOUR SCALE HOPPER SERVED BY A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-88), ONE BAG DUMP HOPPER SERVED BY A HAF EQUIPMENT MODEL 3636S DUST COLLECTOR (HC-89), ONE 250 CUBIC FOOT LOWE INDUSTRIES MIXER (H-21) SERVED BY A FLEX-KLEEN MODEL 30PVBL16 DUST COLLECTOR (HC-21), ONE SWEETENER SCALE

HOPPER, ONE 250 CUBIC FOOT ANDERSON DAHLEN DAY BIN, AND ONE 250 CUBIC FOOT HOLDING MIXER (H-23) SERVED BY A HAF EQUIPMENT MODEL 58CT24S3 DUST COLLECTOR (HC-75)

## IV. SCOPE OF EPA AND PUBLIC REVIEW

The proposed project is a Minor Modification to the Title V permit because no relaxation was given to the existing monitoring, recordkeeping or reporting requirements, and the project was not an SB-288 or Federal major modification under Rule 2201. Therefore, public review is not required.

## V. APPLICABLE REQUIREMENTS

Rule 2520 Federally Mandated Operating Permits (6/21/01)

## VI. DESCRIPTION OF PROPOSED MODIFICATIONS

## N-355-14

This section details the modifications made to the permit conditions on PTO N-355-14-3 during processing the project (N-1120492) that resulted in ATC N-355-14-4.

\*\*\*Equipment Description in PTO N-355-14-3\*\*\*

MIX PLANT SYSTEM (MIXER #28) SERVED BY A BAGHOUSE

The equipment description does not reflect the emission units in a system, and therefore, has been updated to the following:

BULK MATERIAL MIXING OPERATION: TWO FLOUR/SWEETENER SCALE HOPPERS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-90, HC-91), A MIXER #29 AND MANUALLY ADDED INGREDIENTS OPERATION VENTED TO A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-76), A DAY BIN, TWO TRANSITION PNEUMATIC CONVEYING SYSTEMS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 18BV4S2 DUST COLLECTOR (HC-92, HC-93), AND TWO DAY BINS

\*\*\*Condition 3 in PTO N-355-14-3\*\*\*

2. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown as amended December 17, 1992). [District Rule 1100]

This condition has been removed since the facility wide permit N-355-0-3 (condition 1 and 2) already included the necessary permit condition to cover breakdown scenario. The condition was merely a duplication of permit conditions 1 and 2 in facility wide permit N-3550-0-3.

## \*\*\*Permit conditions added during the ATC project\*\*\*

- Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter media. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- Replacement filter media numbering at least 10% of the total number of individual filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201]
- Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]

The above conditions are commonly used for a process served by a dust collector system. Therefore, they are included in these permits. Moreover, these conditions are consistent with some of General Mills existing permits such as PTO N-355-78-4.

 Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

This condition is consistent with District Policy SSP-1005 (9/16/98), which set the applicable visible emission requirements for operations served by baghouse dust collectors.

The bagged ingredients shall be added in a manner minimizing fugitive emissions.
 [District Rule 2201]

Bagged ingredients (i.e., spices such as cinnamon, etc.) are manually loaded into the hopper of a mixer. The facility is required to use best practices to minimize the fugitive emissions.

- PM<sub>10</sub> emissions from this operation shall not exceed 1.7 pounds during any one day.
   [District Rule 2201]
- The permittee shall maintain records sufficient to demonstrate compliance with the
  daily emission limit. These records shall contain each calculated emission quantity
  as well as each process variable used in the respective calculations. All records
  shall be retained for a minimum of five years, and shall be made available for District
  inspection upon request. [District Rules 1070 and 2201]

District Rule 2201 requires having an enforceable daily emission limit (DEL) in a permit. Therefore, this DEL and associated recordkeeping is included in the permit. Note that the District has supplied potential to emit calculations including the emission factors and the processing rates to General Mills that were used in establishing this limit under a separate cover (e-mail on March 29, 2012).

### N-355-78

This section details the modifications made to the permit conditions on PTO N-355-78-4 during processing the project (N-1120492) that resulted in ATC N-355-78-5.

\*\*\*Equipment Description in PTO N-355-78-4\*\*\*

INGREDIENT HOPPER, SCALE, AND TWO BULK MATERIAL MIXING RIBBON BLENDERS SERVED BY A FLEX-KLEEN BAGHOUSE (MODEL #30 PVBL 16)

The equipment description has been updated to the following:

BULK MATERIAL MIXING OPERATION: ONE MAJORS BAG DUMP HOPPER (H-19) SERVED BY AN ANDERSON DAHLEN/FLEX-KLEEN MODEL 18CTBS24I FILTER RECEIVER (HC-19), ONE FLEX-KLEEN MODEL 18CTBS24I MINORS FILTER RECEIVER (HC-20), ONE FLOUR SCALE HOPPER SERVED BY A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-88), ONE BAG DUMP HOPPER SERVED BY A HAF EQUIPMENT MODEL 3636S DUST COLLECTOR (HC-89), ONE 250 CUBIC FOOT LOWE INDUSTRIES MIXER (H-21) SERVED BY A FLEX-KLEEN MODEL 30PVBL16 DUST COLLECTOR (HC-21), ONE SWEETENER SCALE HOPPER, ONE 250 CUBIC FOOT ANDERSON DAHLEN DAY BIN, AND ONE 250 CUBIC FOOT HOLDING MIXER (H-23) SERVED BY A HAF EQUIPMENT MODEL 58CT24S3 DUST COLLECTOR (HC-75)

\*\*\*Condition 6 in PTO N-355-78-4\*\*\*

6. Total controlled PM10 emissions from the ribbon blenders shall not exceed 2.9 pounds during any one day. [District NSR Rule] Y

The potential emissions were re-evaluated using most up-to-date generally accepted emission factors and processing rates, which were deemed confidential. Based on this re-evaluation, this condition was revised to state:

PM<sub>10</sub> emissions from this operation shall not exceed 2.6 pounds during any one day.
 [District Rule 2201]

To verify compliance with the above condition, the following recordkeeping requirement was included in the permit:

 The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]

\*\*\*Permit conditions added during the ATC project\*\*\*

 Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

This condition is consistent with District Policy SSP-1005 (9/16/98), which set the applicable visible emission requirements for operations served by baghouse dust collectors.

• The bagged ingredients shall be added in a manner minimizing fugitive emissions. [District Rule 2201]

Bagged ingredients (i.e., spices such as cinnamon, etc.) are manually loaded into the hopper of a mixer. The facility is required to use best practices to minimize the fugitive emissions.

## VII. COMPLIANCE

In accordance with Rule 2520, 3.20, the proposed project:

- Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- 3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and

- 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

- 1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs (Appendix IV);
- 2. The source's suggested draft permit (Appendix I); and
- 3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used (Appendix III).

Compliance is expected with this Rule.

## **APPENDICES**

Appendix I: Proposed Title V Operating Permit No. N-355-14-5, '-78-6

Appendix II: Authority to Construct N-355-14-4 and '-78-5

Appendix III: Permit Application Appendix IV: Emissions Change

Appendix V: Title V Permit to Operate N-355-14-3 and '-78-4

Appendix I Proposed Title V Operating Permit No. N-355-14-5, '-78-6

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-355-14-5

### **EQUIPMENT DESCRIPTION:**

BULK MATERIAL MIXING OPERATION: TWO FLOUR/SWEETENER SCALE HOPPERS EACH\SERVED BY ITS OWN HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-90, HC-91), A MIXER #29 AND MANUALLY ADDED INGREDIENTS OPERATION VENTED TO A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-76), A DAY BIN, TWO TRANSITION PNEUMATIC CONVEYING SYSTEMS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 18BV4S2 DUST COLLECTOR (HC-92, HC-93), AND TWO DAY BINS

## PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
- Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter media. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
- Replacement filter media numbering at least 10% of the total number of individual filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- The bagged ingredients shall be added in a manner minimizing fugitive emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this operation shall not exceed 1.7 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. Visible emissions from dust collectors that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Each dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions

Facility Name: GENERAL MILLS OPERATIONS. INC Location: WADE BROUGHTON, 2000 W TURNER ROAD, LODI, CA 95242 N-355-14-5: Jul 3 2012 5:11PM - KAHLONJ

- 12. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 15. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour.(amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit

Facility Name: GENERAL MILLS OPERATIONS, INC Location: WADE BROUGHTON,2000 W TURNER ROAD LOD

Location: WADE BROU N-355-14-5: Jul 3 2012 5:11PM – KAHLONJ

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-355-78-6

## **EQUIPMENT DESCRIPTION:**

BULK MATERIAL MIXING OPERATION: ONE MAJORS BAG DUMP HOPPER (H-19) SERVED BY AN ANDERSON DAHLEN/FLEX-KLEEN MODEL 18CTBS24I FILTER RECEIVER (HC-19), ONE FLEX-KLEEN MODEL 18CTBS24I MINORS FILTER RECEIVER (HC-20), ONE FLOUR SCALE HOPPER SERVED BY A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-88), ONE BAG DUMP HOPPER SERVED BY A HAF EQUIPMENT MODEL 3636S DUST COLLECTOR (HC-89), ONE 250 CUBIC FOOT LOWE INDUSTRIES MIXER (H-21) SERVED BY A FLEX-KLEEN MODEL 30PVBL16 DUST COLLECTOR (HC-21), ONE SWEETENER SCALE HOPPER, ONE 250 CUBIC FOOT ANDERSON DAHLEN DAY BIN, AND ONE 250 CUBIC FOOT HOLDING MIXER (H-23) SERVED BY A HAF EQUIPMENT MODEL 58CT24S3 DUST COLLECTOR (HC-75)

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter media. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
- Replacement filter media numbering at least 10% of the total number of individual filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The bagged ingredients shall be added in a manner minimizing fugitive emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this operation shall not exceed 2.6 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from dust collectors that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 10. Each dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed, [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT RECLUREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GENERAL MILLS OPERATIONS, INC

Location: WADE BROUGHTON, 2000 W TURNER ROAD, LODI, CA 95242

N-355-78-8 : Jul 3 2012 5:11PM - KAHLONJ

- 11. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 12. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour.(amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit
- 15. Permit to Operate N-355-23 shall be cancelled upon implementation of this Authority to Construct permit. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GENERAL MILLS OPERATIONS, INC Location: WADE BROUGHTON.2000 W TURNE

Location: WADE BROUGHTON, 2000 W TURNER ROAD LODI N-355-78-6 : Jul 3 2012 5:11PM - KAHLONJ Appendix II Authority to Construct N-355-14-4 and '-78-5







# **AUTHORITY TO CONSTRUCT**

PERMIT NO: N-355-14-4

**ISSUANCE DATE: 03/29/2012** 

LEGAL OWNER OR OPERATOR: GENERAL MILLS OPERATIONS, INC

**MAILING ADDRESS:** 

ATTN: ACCOUNTS PAYABLE

PO BOX 1263

MINNEAPOLIS, MN 55440

LOCATION:

WADE BROUGHTON 2000 W TURNER ROAD

LODI, CA 95240

## **EQUIPMENT DESCRIPTION:**

MODIFICATION OF MIX PLANT SYSTEM (MIXER #28) SERVED BY A BAGHOUSE: REPLACE THE EXISTING HAF EQUIPMENT MODEL 58BV25S2 DUST COLLECTOR (HC-76) WITH A HAF EQUIPMENT MODEL 24 HLBV10S2 DUST COLLECTOR SYSTEM, INSTALL A NEW SCALE HOPPER FOR RECEIVING FLOUR/SWEETENER AND VENT IT TO A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-91), INSTALL A NEW SEPARATE HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-90) THAT WILL SERVE THE EXISTING FLOUR SCALE HOPPER, AND RE-DESIGNATE MIXER #28 TO MIXER #29. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: BULK MATERIAL MIXING OPERATION: TWO FLOUR/SWEETENER SCALE HOPPERS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-90, HC-91), A MIXER #29 AND MANUALLY ADDED INGREDIENTS OPERATION VENTED TO A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-76), A DAY BIN, TWO TRANSITION PNEUMATIC CONVEYING SYSTEMS EACH SERVED BY ITS OWN HAF EQUIPMENT MODEL 18BV4S2 DUST COLLECTOR (HC-92, HC-93), AND TWO DAY BINS

## CONDITIONS

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures 1. of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

#### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin/Executive Director / APCO

DAVID WARNER, Director of Permit Services

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475

- 4. Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter media. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- 5. Replacement filter media numbering at least 10% of the total number of individual filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201]
- 6. Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- 7. Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
- 8. Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
- 9. The bagged ingredients shall be added in a manner minimizing fugitive emissions. [District Rule 2201]
- 10. PM10 emissions from this operation shall not exceed 1.7 pounds during any one day. [District Rule 2201]
- 11. Visible emissions from dust collectors that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 12. Each dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 14. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 15. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]
- 16. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour.(amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit







## **AUTHORITY TO CONSTRUCT**

**PERMIT NO:** N-355-78-5

**ISSUANCE DATE: 03/29/2012** 

LEGAL OWNER OR OPERATOR: GENERAL MILLS OPERATIONS, INC

MAILING ADDRESS:

ATTN: ACCOUNTS PAYABLE

PO BOX 1263

MINNEAPOLIS, MN 55440

LOCATION:

WADE BROUGHTON 2000 W TURNER ROAD LODI, CA 95240

#### **EQUIPMENT DESCRIPTION:**

MODIFICATION OF INGREDIENT HOPPER, SCALE, AND TWO BULK MATERIAL MIXING RIBBON BLENDERS SERVED BY A FLEX-KLEEN BAGHOUSE (MODEL #30 PVBL 16): INSTALL A NEW BAG DUMP HOPPER AND VENT IT TO A HAF EQUIPMENT MODEL 3636S DUST COLLECTOR (HC-89), INSTALL A NEW SEPARATE HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR SYSTEM (HC-88), AND CONSOLIDATE PERMITS N-355-23 INTO N-355-78. THE POST-PROJECT EQUIPMENT WILL BE: BULK MATERIAL MIXING OPERATION: ONE MAJORS BAG DUMP HOPPER (H-19) SERVED BY AN ANDERSON DAHLEN/FLEX-KLEEN MODEL 18CTBS24I FILTER RECEIVER (HC-19), ONE FLEX-KLEEN MODEL 18CTBS24I MINORS FILTER RECEIVER (HC-20), ONE FLOUR SCALE HOPPER SERVED BY A HAF EQUIPMENT MODEL 24HLBV10S2 DUST COLLECTOR (HC-88), ONE BAG DUMP HOPPER SERVED BY A HAF EQUIPMENT MODEL 3636S DUST COLLECTOR (HC-89), ONE 250 CUBIC FOOT LOWE INDUSTRIES MIXER (H-21) SERVED BY A FLEX-KLEEN MODEL 30PVBL16 DUST COLLECTOR (HC-21), ONE SWEETENER SCALE HOPPER, ONE 250 CUBIC FOOT ANDERSON DAHLEN DAY BIN, AND ONE 250 CUBIC FOOT HOLDING MIXER (H-23) SERVED BY A HAF EQUIPMENT MODEL 58CT24S3 DUST COLLECTOR (HC-75)

# **CONDITIONS**

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- 2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Each dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the filter media. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]

## CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive/Director / APCO

DAVID WARNER, Director of Permit Service

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475 Ministry on Regional Office

- 4. Replacement filter media numbering at least 10% of the total number of individual filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 6. Each dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. Visible emissions from each dust collector serving the bulk material mixing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
- 8. The bagged ingredients shall be added in a manner minimizing fugitive emissions. [District Rule 2201]
- 9. PM10 emissions from this operation shall not exceed 2.6 pounds during any one day. [District Rule 2201]
- 10. Visible emissions from dust collectors that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Each dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 12. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 13. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain records sufficient to demonstrate compliance with the daily emission limit. These records shall contain each calculated emission quantity as well as each process variable used in the respective calculations. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 1070 and 2201]
- 15. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour.(amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit
- 16. Permit to Operate N-355-23 shall be cancelled upon implementation of this Authority to Construct permit. [District Rule 2201]

Appendix III Permit Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

# Permit Application For:

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L/M	,		110	, ,, ,,		, ,,,		

[]MINOR MODIFICATION

[] SIGNIFICANT MODIFICATION

PERMIT TO BE ISSUED TO:     General Mills Opera	ations, Inc.	
2 MAILING ADDRESS:		
STREET/P.O. BOX: 2000 W Turner Rd		
aty: Lodi state:	CA	9-DIGIT ZIP CODE: 95242-2239
3. LOCATION WHERE THEE QUIPMENT WILL BE OPERAT	ED:	INSTALLATION DATE:
STREET: 2000 W. Turner Rd.	ary: Lodi	_
1/4 SECTION TOWNSHIP	RANGE	_
4. GENERAL NATURE OF BUSINESS:  Manufacturer of	RTE cereals and baking mixes	) <b>.</b>
DESCRIPTION OF EQUIPMENT OR MODIFI CATION FO (include Permit #s if known, and use additional sheets if necess)	RWHICH APPLICATION IS MADE ary)	
Project Number N-1120492 Permit N-355-14-and manual add stations for Mixers #23 and #2		of scale hopper, dust collectors
r		
For questions regarding this application, contact	Wade Broughton	
6. TYPE OR PRINT NAME OF APPLICANT:		TITLE OF APPLICANT:
Jason Schierling		Plant Manager
7. SIGNATURE OF APPLICANT:	DATE:	PHONE: (209)334-7090
1X	May 7, 2012	FAX: (209) 334-7090 EMAILwade.broughton@genmills.com
For APCD Use Only:	,	
DATE STARE CHIVED FILING FE	F	

rol Arch use only.		
DATE STATE ECEIVED	FILING FEE RECEIVED: \$ <del>0</del>	CHECK#
JUN 0 4 2012	DATE PAID:	
SJVAPCD	PROJECTNO: NII 21419	FAGILITYID: N-355
DICHEST AND THE PROPERTY OF TH		

# San Joaquin Valley Unified Air Pollution Control District

## TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I.	TYPE OF PE	RMIT ACTION	(Check appropri	iate	box)	a a
[]	SIGNIFICANT PE MINOR PERMIT N	ERMIT MODIFICATION MODIFICATION		M	ADMINISTRATIVE AMENDMENT	
		General Mills Oper			A	FACILITY ID: N - 355
1.	Type of Organizat	ion:[X] Corporation [	] Sole Ownership	[]	Government []Partnersh	ip []Utility
2.	Owner's Name:	General Mills Op	erations, Inc.			
3.	Agent to the Owne	er.				
II.	COMPLIANCE	CERTIFICATION	(Read each state)	ment	carefully and initial all	circles for confirmation):
(		nformation and belief for comply with the appli				entified in this application will
	comply wit	h applicable federal re	quirement(s) that	will	become effective during the	entified in this application will e permit term, on a timely basis.
	Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.					
	Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.					
Ιd	I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:					
	XX	3	7		May 7,	2012
Si	gnature of Respons	hible Official			Date	"
	Jason Schierling	y				
N	ame of Responsible	Official (please print)				
	Plant Manager					
Ti	tle of Responsible (	Official (please print)				

Appendix IV Emissions Change

# Emissions Change

PM10 emissions change under project N-1120492 that resulted in ATCs N-355-14-4 and '-78-5 is summarized in the following table.

PM <sub>10</sub> Emissions Change						
Pollutant	Annual PE2 (lb/yr)	Annual PE1 (lb/yr)	Quarterly IPE (lb/qtr)			
N-355-14-4	622	512	27.5			
N-355-78-5	950	950	0			

 $\label{eq:Appendix V} \mbox{Title V Permit to Operate N-355-14-3 and '-78-4}$ 

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-355-14-3

**EXPIRATION DATE: 04/30/2016** 

**EQUIPMENT DESCRIPTION:** 

MIX PLANT SYSTEM (MIXER #28) SERVED BY A BAGHOUSE

## PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
- 3. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown as amended December 17, 1992). [District Rule 1100] Federally Enforceable Through Title V Permit
- 4. Visible emissions from baghouses that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 5. Baghouse dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 6. Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 7. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour.(amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GENERAL MILLS OPERATIONS, INC

Location: WADE BROUGHTON, 2000 W TURNER ROAD, LODI, CA 95242 N-355-14-3: Jul 3 2012 5:11PM - KAHLONJ

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-355-78-4

**EXPIRATION DATE: 04/30/2016** 

#### **EQUIPMENT DESCRIPTION:**

INGREDIENT HOPPER, SCALE, AND TWO BULK MATERIAL MIXING RIBBON BLENDERS SERVED BY A FLEX-KLEEN BAGHOUSE (MODEL #30 PVBL 16)

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally 1. Enforceable Through Title V Permit
- The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
- Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
- Material removed from the baghouses shall be disposed of in a manner preventing entrainment into the atmosphere. 4. [District NSR Rule] Federally Enforceable Through Title V Permit
- The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
- Total controlled PM10 emissions from the ribbon blenders shall not exceed 2.9 pounds during any one day. [District 6. NSR Rule] Federally Enforceable Through Title V Permit
- Visible emissions from baghouses that are in operation shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- Baghouse dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- Baghouse dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 10. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
- 11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59xP^0.62 if P is less than or equal to 30 tons per hour, or E=17.37xP^0.62 if P is greater than 30 tons per hour (amended December 17, 1992) [District Rule 4202] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GENERAL MILLS OPERATIONS, INC

Location: WADE BROUGHTON, 2000 W TURNER ROAD, LODI, CA 95242